

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

REENA S. MATHEW,
Plaintiff

v.

SANTANDER CONSUMER USA INC.,
Defendant

§
§
§
§
§
§
§

Civil Action No. 3:23-cv-01494-N

PLAINTIFF'S REQUESTED VOIR DIRE QUESTIONS

Plaintiff requests that the Court ask the potential jurors the following questions. Plaintiff also requests at least thirty minutes for her attorney to conduct voir dire and interact with the potential jurors, and submitting the following questions is not intended as a substitute for voir dire by her trial counsel.

1. Both Reena Mathew and Santander Consumer USA Inc. are entitled to have this case heard by a fair and impartial jury. If you have personal experience or special knowledge about an issue in this case, would you find it difficult to be a fair and impartial juror in this particular case?

2. Reena Mathew is represented by Donald E. Uloth. Has anyone ever heard of him? What have you heard? Is there something in your knowledge or experience with him that would prevent you from being fair and impartial in this case?

3. Santander Consumer USA Inc. is represented by Monte Hurst and Clayton Carter with the law firm of Hallett & Perrin, P.C. Has anyone ever heard of these lawyers or law firm before? What have you heard? Is there something in your knowledge or experience with regard to them that would prevent you from being fair and impartial in this case?

4. The following are potential witnesses in this case. Does anyone know, or think they know, any of these people? [read witness list]

5. Is there anyone here who knows someone else on this jury panel? If so, what other panel member do you know, and how do you know them?

6. Do any of you know anyone in this courtroom: Judge Godbey, the attorneys, courtroom staff, anyone who works in this court?

7. Have any of you ever worked for Santander Consumer USA Inc.? If so:

- a. In what capacity?
- b. During what period of time?
- c. Because of that experience, do you feel that you bring some expertise in deciding this case that some of the other jurors may not have?

8. Does anyone have a family member or close friend who has ever worked for Santander Consumer USA Inc.? If so:

- a. In what capacity?
- b. During what period of time?
- c. What is your relationship?
- d. Because of that experience, do you feel that you bring some expertise in deciding this case that some of the other jurors may not have?

9. Does anyone have any experience working in human resources or personnel? Please describe it.

10. Does anyone have any training or experience in Human Resources or personnel matters? Please describe it.

11. Has anyone ever been in management at their place of business? If so:

- a. When you were in management, what were your three biggest frustrations?
- b. Did you or do you find it difficult to deal with human resources or personnel issues?

12. Have you ever hired or fired someone?

13. Have you ever been accused of discriminating against someone? If so:

- a. What were you accused of doing?
- b. What happened?

14. Is anyone close to someone – a friend or family member – who has been accused of discrimination in the workplace? If so, who was the person, what was their relationship to you, and what were the circumstances?

15. Has anyone ever been in charge of investigating a complaint by an employee against an employer?

16. Have any of you ever participated in investigating whether another employee or co-worker was discriminated against or harassed for any reason?

17. Does anyone feel that there are simply too many lawsuits filed by employees against employers?

18. What do you think people should do if they feel their rights have been violated?

19. Have you seen or read any news on pregnancy discrimination; how did you feel about it?

20. What do you think about pregnancy discrimination in the workplace? Do you think it often goes unreported?

21. Have you or any close family members ever had something happen where you or they could have filed a lawsuit and chose not to? Could you tell me what happened? Why did you/they choose not to file a lawsuit?

22. Have you or any member of your family or a close friend ever been fired or laid off? If so, what were the circumstances? Did you believe the termination was fair? Did you do anything to try to get your job back?

23. Does anyone believe that being discriminate against or fired cannot cause one to feel humiliated, ashamed or frustrated?

24. Does anyone think it would be unreasonable for an individual to feel humiliated and frustrated when they are discriminated against or fired?

25. Some people believe that a person who was fired because of unlawful discrimination based should be allowed to recover money as compensation for the mental pain and suffering caused by the firing. Other people do not think money should be paid for mental pain and suffering. Which statement describes your opinion?

26. If you found that someone was wrongfully fired, how would you feel about awarding that person money for any mental and/or emotional injuries suffered as a result of being fired?

27. If the judge were to instruct you that such compensation was proper under the law, would you have any hesitation about making such an award if the evidence warranted it?

28. Do you think that any dollar amount awarded by the jury should be limited in some way, or does anyone here have a limit in their mind, or a maximum amount of money, beyond which they would never go in deciding an employment discrimination case, regardless of the evidence? Who here thinks that \$10 would be too much to award in an employment discrimination case? Who here thinks that \$100,000 would be too much to award in an employment discrimination case? Who here thinks that \$300,000 would be too much to award in an employment discrimination case?

29. Does anyone have a religious moral or philosophical opposition to awarding compensatory damages if the evidence warrants a finding of compensatory damages, such as mental anguish?

30. Would you have trouble holding Santander Consumer USA Inc. responsible for the discriminatory actions taken by one of its managers or supervisors?

31. Is there anyone who has concerns about their ability to be a fair and impartial juror of the particular facts in the case because of something you have heard during this jury selection process? Please tell us what your concerns are.

32. Is there anyone who for any other reason feels he or she should not be a member of this jury? Please explain.

33. If you were trying to select a jury for this case, is there anything about you that you think the parties and the lawyers should know about that hasn't already been discussed?

34. Is there anyone who would like to privately discuss something that bears on their ability to serve as a juror in this case?

35. If you disagreed with what a law requires or prohibits, could you be impartial in weighing evidence and finding facts in a case to determine whether that law has been violated?

36. Has anyone read or heard or know anything about the subject matter of this trial?

Respectfully submitted,

/s/ Donald E. Uloth
Donald E. Uloth
Texas Bar No. 20374200
Donald E. Uloth, P.C.
18208 Preston Road, Suite D-9 # 261
Dallas, Texas 75252
Phone: (214) 989-4396
Email: don.uloth@uloth.pro
Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that on December 7, 2024 I am filing this motion electronically using the Court's ECF filing system, which will email a file-marked copy of this motion to all counsel of record.

/s/ Donald E. Uloth
Donald E. Uloth